

Rosemary M. Rivas (State Bar No. 209147)
Email: rrivas@zlk.com
LEVI & KORSINSKY, LLP
44 Montgomery Street, Suite 650
San Francisco, California 94104
Telephone: (415) 291-2420
Facsimile: (415) 484-1294

Donald J. Enright (admitted *pro hac vice*)
Email: denright@zlk.com
LEVI & KORSINSKY, LLP
1101 30th St., NW, Ste. 115
Washington, DC 20007
Telephone: (202) 524-4292
Facsimile: (202) 333-2121

Eduard Korsinsky (to be admitted *pro hac vice*)
Email: ek@zlk.com
LEVI & KORSINSKY, LLP
30 Broad Street, 24th Floor
New York, New York 10004
Telephone: (212) 363-7500
Facsimile: (212) 636-7171

Counsel for Plaintiff Andrew Okusko

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANDREW OKUSKO, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., THE
TEZOS FOUNDATION, KATHLEEN
BREITMAN, ARTHUR BREITMAN, and
TIMOTHY DRAPER,

Defendants.

Case No. 3:17-cv-06829-RS

CLASS ACTION

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR EXPEDITED DISCOVERY**

**[This motion will be subject to a motion for an
order shortening time pursuant to L.R. 6-1.]**

Date: February 29, 2018
Time: 1:30 p.m.
Judge: Hon. Richard Seeborg
Crtrm.: 3, 17th Floor

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on February 29, 2018, at 1:30 p.m., or as soon as the matter may be heard, in Courtroom 3, 17th Floor of the Honorable Richard Seeborg of the United States District Court for the Northern District of California, located at 450 Golden Gate Avenue, San Francisco, CA 94102, Plaintiff Andrew Okusko ("Plaintiff"), by and through his respective attorneys, will and hereby does move this Court pursuant to Rule 26(d)(1) of the Federal Rules of Civil Procedure for an order permitting Plaintiff to take expedited limited discovery from Defendants Dynamic Ledger Solutions, Inc., and the Tezos Foundation in advance of the parties' Rule 26 conference.

As detailed in the accompanying Memorandum of Points and Authorities, Plaintiff seeks narrowly tailored limited discovery solely related to the status and security of the Bitcoin ("BTC") and Ether ("ETH") raised in connection with the Tezos initial coin offering that took place July 1, 2017 through July 14, 2017 (the "ICO Proceeds").

This Motion is made and based on this Notice, the accompanying Memorandum of Points and Authorities, the declaration of Donald J. Enright and the exhibits thereto, the proposed order granting expedited discovery, all records and files in this action, and such other matter, evidence, and argument as may be presented at or prior to a hearing on the Motion.

Pursuant to L.R. 37-1(a), Plaintiff's counsel hereby certifies that counsel has conferred with counsel for Defendants in a good faith effort to resolve the issues raised by the instant motion and the Parties have been unable to reach an agreement on the issues addressed herein.

Respectfully submitted,

Dated: January 24, 2018

LEVI & KORSINSKY, LLP

By: /s/ Donald J. Enright
 Donald J. Enright (admitted *pro hac vice*)
 1101 30th St., NW, Ste. 115
 Washington, DC 20007
 Telephone: (202) 524-4292
 Facsimile: (202) 333-2121

Rosemary M. Rivas
LEVI & KORSINSKY, LLP
 44 Montgomery Street, Suite 650
 San Francisco, CA 94104
 Telephone: (415) 291-2420
 Facsimile: (415) 484-1294

Eduard Korsinsky (to be admitted *pro hac vice*)

LEVI & KORSINSKY, LLP

30 Broad Street, 24th Floor

New York, New York 10004

Telephone: (212) 363-7500

Facsimile: (212) 636-7171

Counsel for Plaintiff Andrew Okusko